

1 James S. Greenan (SBN 53648)
jgreenan@gpsllp.com
2 Nelson Hsieh (SBN 177128)
nhsieh@gpsllp.com
3 Yen Chau (SBN 221087)
ychau@gpsllp.com
4 GREENAN, PEFFER, SALLANDER & LALLY LLP
Post Office Box 10
5 6111 Bollinger Canyon Road, Suite 500
San Ramon, California 94583
6 Telephone: (925) 866-1000
Facsimile: (925) 830-8787
7
8 Attorneys for Defendants ST. PAUL FIRE &
9 MARINE INSURANCE CO. and
GREENAN, PEFFER, SALLANDER &
LALLY LLP

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

13 MANI SUBRAMANIAN, as an individual and)
14 citizen of Washington, and as a derivative)
action plaintiff,)
15 Plaintiff,)
16 vs.)
17 ST. PAUL FIRE & MARINE INSURANCE)
COMPANY, a Minnesota Corporation, and)
18 QAD, INC., a Delaware Corporation and)
principal place of business in California, and)
19 ARTHUR ANDERSON LLP, a limited)
liability partnership headquartered in Chicago,)
20 Illinois, and ANDERSEN WORLDWIDE SC,)
a Societe Cooperative headquartered in)
21 Geneva, Switzerland, and JOHN DOORDAN,)
an individual and citizen of California, and)
22 LAIFOON LEE, an individual and Citizen of)
California, and ROLAND DESILETS, an)
23 individual and citizen of new jersey, and)
WILLIAM D. CONNELL, an individual and)
24 citizen of California, and GREENAN)
PEFFER, SALLANDER AND LALLY LLP, a)
25 limited liability partnership headquartered in)
California, and RANDALL WULFF, an)
26 Individual, and DOES 1-50, inclusive,)
27 Defendants.)
Case No. C08-1426 JSW
**REQUEST FOR JUDICIAL NOTICE IN
SUPPORT OF MOTION TO DECLARE
PLAINTIFF MANI SUBRAMANIAN A
VEXATIOUS LITIGANT AND FOR A
PRE-FILING ORDER PURSUANT TO 28
USC SECTION 1651**
Date: October 9, 2008
Time: 2:30 p.m.
Dept.: Courtroom 6
The Honorable Vaughn R. Walker

4

Greenan,
Peffer,
Sallander &
Lally LLP

1 Pursuant to Federal Rule of Evidence 201(b)(2) Defendants St. Paul Fire and Marine
 2 Insurance Company and Greenan Peffer Sallander & Lally, LLP request that the Court take
 3 judicial notice of the following documents and materials:

4 1. Motion for relief from the Judgment (Rule 60(b)) in Case No. 04-1249 VRW, filed
 5 June 5, 2008;

6 2. Motion for Correction and Clarification of the December 2007 Judgment in Case No.
 7 04-1249 VRW, filed June 5, 2008;

8 3. Order of Chief J. Walker, dated July 17, 2008, Regarding Requests for Debtor's
 9 Examination and Order to Show Cause, Withdrawal of Counsel, and Motion for Relief from
 10 Judgment and Motion for Administrative Relief;

11 4. Notice of Motion, Motion and Memorandum for Clarification and reconsideration of
 12 July 17, 2008 Order, dated July 28, 2008 in Case Nos. 04-1249 VRW, 04-1818 VRW and 04-
 13 1403 VRW;

14 5. Motion for Dismissal in Vedatech K.K. and Mani Subramanian v. Crystal Decisions,
 15 Inc. et al, U.S. District Court, Northern District, San Jose Division, Case No. C03 04578
 16 RMW/RS;

17 6. Status Report and Ex Parte Motion and Declaration of Mani Subramanian for
 18 Continuation of Hearing in Vedatech K.K. and Mani Subramanian v. Crystal Decisions, Inc. et
 19 al, U.S. District Court, Northern District, San Jose Division, Case No. C03 04578 RMW/RS;

20 7. Order of Chief J. Walker, dated June 22, 2005, Regarding Removal, Requests for
 21 Sanctions, and Motions to Dismiss in Related Actions Nos. 04-1249 VRW, 04-1818 VRW and
 22 04-1403 VRW (2005 WL 1513130 (N.D. California);

23 8. Judgment, entered December 27, 2007, filed in Related Actions Nos. 04-1249 VRW,
 24 04-1818 VRW and 04-1403 VRW;

25 9. Complaint, *QAD Inc. and QAD Japan K.K. v. Mani Subramanian, et al.* Case No.
 26 CV-771638 filed in Santa Clara Superior Court, consolidated with Case No. CV-784685;

27 10. Complaint, *Vedatech KK et al. v. QAD, Inc. et al.* Case No. CV-784685, filed in
 28 Santa Clara Superior Court, consolidated with Case No. CV-771638;

1 11. Complaint for Declaratory Relief and Cross-Complaint, *St. Paul Fire & Marine*
2 *Insurance Co v. Vedatech International, Inc. et al* Case No. CV-805197, filed in Santa Clara
3 Superior Court;

4 12. Complaint, *Vedatech, Inc. et al. v. St. Paul Fire & Marine Insurance Co, et al.*, filed
5 in Action No. 04-1249 VRW, filed in this court; and

6 13. Mandate of Ninth Circuit in No. 05-16405 (D.C. No. CV-04-1249 VRW), filed July
7 19, 2007.

8 | Dated: August 4, 2008

GREENAN, PEFFER, SALLANDER & LALLY LLP

By: _____ /s/
James S. Greenan
Attorneys for Defendants ST. PAUL FIRE &
MARINE INSURANCE CO. and GREENAN
PEFFER SALLANDER & LALLY, LLP

1 Regarding: REQUEST FOR JUDICIAL NOTICE IN SUPPORT OF MOTION TO DECLARE
2 PLAINTIFF MANI SUBRAMANIAN A VEXATIOUS LITIGANT AND FOR A PRE-FILING
3 ORDER PURSUANT TO 28 USC SECTION 1651

4 This filing is in paper or physical form only, and is being maintained in the case file in the
5 Clerk's office. If you are a participant in this case, this filing will be served in hard-copy shortly.
6 For information on retrieving this filing directly from the court, please see the court's main web
7 site at <http://www.cand.uscourts.gov> under Frequently Asked Questions (FAQ).

8 This filing was not efiled for the following reason(s):

9 Voluminous Document (PDF file size larger than the efilng system allows)

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

26

27

28